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Attorney for Debtor:
 RENEE MENDOZA

UNITED STATES BANKRUPTCY COURT
 EASTERN DISTRICT OF CALIFORNIA
 SACRAMENTO DIVISION

In the Matter of:	Case No.	2019-22882
	Control No.	HDR-1
RENEE MENDOZA,	DATE:	July 09, 2019
Debtor.	TIME:	9:30 am.
	COURTROOM:	Rm 32, 6th Floor
_____ /	JUDGE:	Christopher D. Jaime

**MOTION TO COMPEL THE TRUSTEE TO ABANDON THE ESTATE'S INTEREST IN
 REAL PROPERTY OF THE BANKRUPTCY ESTATE**

Debtor, RENEE MENDOZA (Debtor"), by and through her attorney of record, Harry D. Roth, hereby move this Court for an Order Compelling the Trustee to Abandon the estate's interest in Real Property of the Bankruptcy estate. The Motion is based on the following facts:

1. This case was commenced with the filing of a petition on May 4, 2019. Alan Fukushima was duly appointed to serve as the Trustee in this case.
2. This motion is brought pursuant to 11 U.S.C. §554(b) and Rule 6007 of the Federal Rules of Bankruptcy Procedure.
3. As shown in Schedule A/B of the filed schedules of this case, the Debtor has an interest in

the real property commonly-known as 405 Gibson Rd Woodland, CA 95695 (hereinafter, the "ASSET"). A copy of schedule A/B is shown in the concurrently-filed Exhibits and is incorporated herein by reference. This Scheduled listed value of the ASSET at \$275,000.

4. The asserted value is based on the Debtor's opinion of 405 Gibson Rd. Woodland, CA 95695. Debtor's Declaration in support of this value is filed concurrently with this motion and incorporated herein by reference.

5. The Debtor, holds a partial ownership interest in the ASSET.

6. As shown in Schedule D of the filed case, Seterus and Yolo Federal Credit Union hold a security interest in the ASSET. A copy of Schedule D is shown in the concurrently filed Exhibits and is incorporated herein by reference.

7. The Debtor further believes and asserts that the present balance owed the Debtor to Seterus and Yolo Federal Credit Union is \$165,340.75.

8. In summary

Value of ASSET.....	\$275,000.00
Less: Mortgage Lien.....	<u>\$151,770.60</u>
Second Mortgage: Yolo Federal CU.....	<u>\$ 13,570.15</u>
Equity.....	<u>\$109,659.25</u>
Less: Exemption claimed.....	\$100,000.00
Cost of Sale (8%).....	\$ 22,000.00
Net Equity.....	\$ (12,340.75)

9. Pursuant to 11 U.S.C. §554(b), the court may order the Trustee to abandon the estate's interest in assets of the estate.

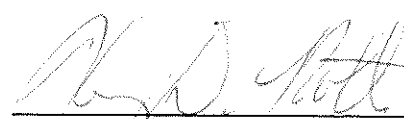
10. Federal Rule of Bankruptcy Proceeding 6007(b) permits a party in interest, including the Debtor, to file a motion seeking to compel the Trustee to abandon property of the estate.

11. Based on the foregoing and the Declaration filed herewith, the Debtor asserts that the value of the estate's interest in the ASSETS is \$0.00.

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4 **WHEREFORE**, DEBTOR, moves the Court to compel the Trustee to Abandon the estate's interest
5 in Real Property, commonly known as 405 Gibson Rd. Woodland, CA 95695.

6 Respectfully submitted,
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11 DATED: 11 June 19



12 HARRY D. ROTH,
13 Attorney for Debtor
14 RENEE MENDOZA
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